IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN Re: TEMITOPE ABU : Chapter 13

TAKESHIA SHONTAY ABU

DEBTORS : Case No. 1:24-bk-02936-HWV

:

MIDFIRST BANK, :

MOVANT

:

TEMITOPE ABU :

TAKESHIA SHONTAY ABU : RESPONDENTS :

J

JACK N. ZAHAROPOULOS :

TRUSTEE :

DEBTORS' RESPONSE TO MOTION OF MIDFIRST BANK'S MOTION FOR RELIEF FROM THE AUTOMATIC STAY UNDER 11 U.S.C. 362 PURSUANT TO BANKRUPTCY PROCEDURE RULE 4001

- 1. Movant, Midfirst Bank, filed its Motion For Relief From The Automatic Stay on March 28, 2025.
- 2. Debtors acknowledge that they are delinquent on mortgage payments.
- 3. Debtors would like the opportunity to get caught up on post-petition payments.
- 4. Debtors request the Court deny Movant's Motion for Relief.

WHERFORE, Debtors, Temitope Abu and Takeshia Shontay Abu, prays the Court enter its Order denying the Motion For Relief From The Automatic Stay that was filed March 28, 2025 by Midfirst Bank.

Dated: March 28, 2025 Respectfully Submitted,

/s/Nicholas G. Platt

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